Application No.: 10/656736 Docket No.: SS3335USDIV1

Page 2

REMARKS

Rejection under 35 U.S.C. §103 over Sami et al. in view of GB 1,060,689

Claims 27-32 stand rejected under 35 U.S.C. §103 as being obvious over Sami et al. (U.S. Patent No. 6,295,925) in view of GB 1,060,689 (hereinafter GB '689). Applicants traverse this basis for rejection and respectfully request reconsideration and withdrawal thereof.

Initially, Applicants would like to clarify that the amendment to claim 27 to change the word "means" to "zones" was not made in an effort to distinguish over the cited references, but merely to conform the characterization of the heating zones described earlier in the claim with that later in the claim.

Present claim 27 requires that a tension isolation means be situated between the first and second heating zones of the claimed apparatus, which not only acts to provide tension on the fabric within the first heating zone, but to reduce or eliminate tension on the fabric in the second heating zone, thus reducing or eliminating the occurrence of stretch-type defects in the finished fabric.

The Examiner maintains the rejection over Sami et al. in view of GB '689, and asserts that Sami et al.'s multiple "printing and drying sections" are equivalent to the heating zones of the present invention. Applicants traverse the Examiner's finding on this issue.

Referring to Figure 1 of Sami et al., as described at column 3, lines 33-65, the Sami et al. apparatus comprises several printing/drying stations within printing/drying section 16, through which the web material passes. The infeed tension controlling system 12 is <u>not</u> positioned between any two printing/drying stations in section 16, but instead downstream of all said printing/drying stations. Sami et al. state:

To help maintain the desired even tension through the printing/drying section 16, the present invention involves the mounting of the middriven infeed tension controlling system 12 between the printing/drying section 16 and the converting section 18. (Col. 3, lines 60-65; emphasis added).

Accordingly, even if the skilled artisan were to agree with the Examiner's reading and interpretation of the equivalence of the printing/drying stations 16 of Sarni et al. and the two drying zones of the present claims, the infeed tension controlling system of Sarni et al. is clearly not positioned between any two

Application No.: 10/656736 Docket No.: S\$3335U\$DIV1

Page 3

printing/drying stations of the Sami et al. apparatus. Likewise, Sami et al. provide no motivation to the skilled artisan to modify the Sami et al. apparatus so as to insert the infeed tension controlling system 12 within the printing/drying section 16 of Sami et al.'s apparatus.

GB '689 fails to cure this deficiency of Sami et al., and is cited by the Examiner only for the purpose of suggesting that it is known to use serpentine rolls to isolate tension within a fabric processing apparatus. But GB '689 fails to disclose or suggest any benefit to be derived from Inserting a tension isolation means (serpentine rolls) between any two of the multiple printing/drying stations of Sami et al.

Applicants respectfully submit that the references, even in combination, fail to teach each and every limitation of the present claims, and therefore fail to establish a prima facie case of obviousness as to the present claims.

Application No.: 10/656736 Docket No.: SS3335USDIV1

5/15/06

Page 4

In view of the foregoing, allowance of the above-referenced application is respectfully requested.

Respectfully submitted,

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